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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

N.Z., R.M., B.L., S.M., and A.L.,
individually and on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

FENIX INTERNATIONAL LIMITED,
FENIX INTERNET LLC, BOSS
BADDIES LLC, MOXY
MANAGEMENT, UNRULY AGENCY
LLC (also d/b/a DYSRPT AGENCY),
BEHAVE AGENCY LLC, A.S.H.
AGENCY, CONTENT X, INC., VERGE
AGENCY, INC., AND ELITE
CREATORS LLC,
Defendants.

Case No. 8:24-cv-01655-FWS-SSC

**JOINT STIPULATION TO
EXTEND WORD LIMIT**

Hon. Fred W. Slaughter

1 Plaintiffs N.Z., R.M., B.L., S.M., and A.L. (collectively, “Plaintiffs”),
2 Defendants Fenix International Limited and Fenix Internet LLC (collectively, the
3 “Fenix Defendants”), and Defendants Content X, Inc., Elite Creators LLC, Moxy
4 Management, Verge Agency, Inc., Unruly Agency LLC, and Behave Agency LLC
5 (collectively, the “Agency Defendants,” collectively with the Fenix Defendants,
6 “Defendants,” and collectively with Plaintiffs, the “Parties”) hereby stipulate and
7 agree as follows:

9 WHEREAS, the Defendants filed various Motions to Dismiss and a Motion
10 to Strike, and the Fenix Defendants filed a Request for Judicial Notice on May 23,
11 2025 (collectively “Defendants’ Motions”) (ECF Nos. 121–129);

13 WHEREAS, Plaintiffs believe it would conserve judicial and party resources
14 to consolidate their arguments in response to the nine Motions filed by Defendants
15 into three briefs, and may need to exceed the word limit set by Local Rule 11-6.1
16 for a single brief in order to respond fully and efficiently to Defendants’ Motions;

17 WHEREAS, in response to each of the nine Motions filed by Defendants,
18 Plaintiffs are entitled to file a separate brief, limited to 7,000 words each under
19 Local Rule 11-6.1, and would thus be entitled to 63,000 words in the aggregate;

20 WHEREAS, Plaintiffs respectfully request to extend their per-brief word
21 limit from 7,000 words to 10,000 words, resulting in an aggregate limit of 30,000
22 words.

23
24 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by
25 and between the Parties, through their undersigned counsel and subject to Court
26 approval, that Plaintiffs shall be allowed an aggregate limit of 30,000 words for
27 their consolidated oppositions to Defendants’ Motions.
28

DATED: July 14, 2025 Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Robert B. Carey

ROBERT B. CAREY

Attorneys for Plaintiffs

Pursuant to CIV. L.R. 5-4.3.4(a)(2)(i), all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ Jason D. Russell

JASON D. RUSSELL

Attorneys for Specially Appearing Defendants

Fenix International Limited and Fenix Internet LLC

KINGFISHER LAW APC

By: /s/ Nithin Kumar

NITHIN KUMAR

Attorney for Defendant

Content X, Inc.

DENTONS US LLP

By: /s/ Trinity Jordan

TRINITY JORDAN

Attorneys for Defendant

Elite Creators LLC

BIRD, MARELLA, RHOW, LINCENBERG, DROOKS
& NESSIM, LLP

By: /s/ Barr Benyamin

BARR BENYAMIN

Attorneys for Defendant

Moxy Management

1
2 CONSTANGY BROOKS SMITH AND PROPHETE
3 LLP

4 By: /s/ Younjin Lee
5 YOUNJIN LEE
6 *Attorneys for Defendant*
7 Verge Agency, Inc.

8 THE JACOBS LAW FIRM, PC

9 By: /s/ Matthew Jacobs
10 MATTHEW JACOBS
11 *Attorney for Defendants*
12 Unruly Agency LLC and Behave Agency LLC
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